

Exhibit A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re	:	Chapter 11
	:	
TERRAFORM LABS PTE. LTD.,	:	Case No. 24–10070 (BLS)
	:	
Debtor. ¹	:	Re: Docket No. ____
	:	
	X	

**ORDER SHORTENING NOTICE AND
OBJECTION PERIODS *SOLELY* WITH RESPECT TO THE
WINTERMUTE ORDER SOUGHT IN MOTION OF DEBTOR FOR
ENTRY OF ORDERS PURSUANT TO SECTIONS 363, 503(B), AND 105(A)
OF THE BANKRUPTCY CODE AUTHORIZING DEBTOR TO PAY CERTAIN
AMOUNTS IN FURTHERANCE OF LITIGATION AND GRANTING RELATED RELIEF**

Upon the motion (the “**Motion to Shorten**”)² of Terraform Labs Pte. Ltd., as debtor and debtor in possession in the above-captioned chapter 11 case (the “**Debtor**”), pursuant to section 105(a) of the Bankruptcy Code, Bankruptcy Rule 9006(c)(1), and Local Rules 9006-1(c), (d) and (e), shortening the notice and objection periods solely with respect to the Wintermute Order sought in the Motion, all as set forth more fully in the Motion to Shorten; and this Court having jurisdiction to consider the Motion to Shorten and the relief requested therein pursuant to 28 U.S.C. §§ 157(a)–(b) and 1334(b), and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and consideration of the Motion to Shorten and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion to Shorten having been provided under the circumstances; and such notice having been appropriate under the circumstances, and it appearing that no other or further

¹ The Debtor’s principal office is located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

² Capitalized terms used but otherwise not defined herein shall have the meanings set forth in the Motion to Shorten.

notice need be provided; and this Court having reviewed the Motion and the Motion to Shorten; and it appearing that the relief requested in the Motion to Shorten is in the best interests of the Debtor, its estate, creditors, and all parties in interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion to Shorten is granted to the extent set forth herein.
2. The hearing to consider entry of the Wintermute Order shall be held on **February 28, 2024 at 1:00 p.m. (Eastern Time)**.
3. Objections, if any, to entry of the Wintermute Order shall be filed and served by no later than **February 23, 2024 at 4:00 p.m. (Eastern Time)**.
4. The Debtor is authorized to file a reply or response to any objections to the entry of the Wintermute Order, and such reply or response shall be filed and served by no later than **February 27, 2024 at 4:00 p.m. (Eastern Time)**.
5. The Debtor is authorized to take all action necessary to effectuate the relief granted in this Order.
6. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.